



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charleta B. Tavares, Treasurer
Ohio Democratic Party Federal
Campaign Account
37 West Broad Street, Suite 430
Columbus, OH 43215

MAR - 5 1997

Identification Number: C00016899

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Ms. Tavares:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the

committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, Lines i), ii)e), and iii)e) for the transfer-in from the State Campaign Account do not add up to the 9/18/96 \$130,475.55. Please amend your report to correct this discrepancy. 11 CFR §104.10

-Your Schedule H3 for Line 18, Page 11 lists a transfer of \$65,875 from the State Campaign Account. However, in the breakdown of transfers received, the amount is itemized as both administrative/voter drive and state ballot. Please clarify the correct category for this transfer.

-Please clarify all expenditures made for Political Advertising/Media, GOTV Newspaper Ad and Billboard Advertising on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Schedule A supporting Line 12 discloses a transfer-in from the Democratic National Committee. Schedule H4 supporting Line 21(a) reflects payments for Portage Ballot, Lake Ballot, Hamilton Ballot and Montgomery Ballot. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used including distribution by direct mail; all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfers-in and subsequent payments for the Ballots. If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for the joint expenditure to Ohio VCS.

Note that the unique identifying code for an event is not considered an adequate description of purpose. Please amend your report to include this missing information.

-Your report includes computer produced formats of Schedules B and H4. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Melissa Hurd
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

 Use separate schedule(s)
for each category of the
Detailed Summary Page

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FOR LINE NUMBER
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Any information copied from such reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ohio Democratic Party Federal Campaign Account

Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 07/02/96	Amount of Each Receipt this Period \$ 40951.00
Receipt for Federal Election Year	Aggregate YTD \$	789624.00	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 07/05/96	Amount of Each Receipt this Period \$ 23430.00
Receipt for Federal Election Year	Aggregate YTD \$	793054.00	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 07/23/96	Amount of Each Receipt this Period \$ 8008.00
Receipt for Federal Election Year	Aggregate YTD \$	799060.00	
Full Name, Mailing Address and ZIP Code Association of State Democratic Chairs 430 S. Capitol St. Washington, DC 20003	Name of Employer Association of State Democratic Chairs Occupation	Date 07/26/96	Amount of Each Receipt this Period \$ 22000.00
Receipt for Federal Election Year	Aggregate YTD \$	88000.73	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 07/30/96	Amount of Each Receipt this Period \$ 26235.00
Receipt for Federal Election Year	Aggregate YTD \$	825295.00	
Full Name, Mailing Address and ZIP Code Erie County Democratic Party 209 Gilcher Ct Sandusky, OH 44870	Name of Employer Erie County Democratic Party Occupation	Date 08/12/96	Amount of Each Receipt this Period \$ 1000.00
Receipt for Federal Election Year	Aggregate YTD \$	1000.00	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 08/15/96	Amount of Each Receipt this Period \$ 11042.00
Receipt for Federal Election Year	Aggregate YTD \$	836337.00	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 09/06/96	Amount of Each Receipt this Period \$ 21080.00
Receipt for Federal Election Year	Aggregate YTD \$	857427.00	

TOTAL This Period (last page this line number only)

\$ 151754.00

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
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NAME OF COMMITTEE (In Full)

Ohio Democratic Party Federal Campaign Account

Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 09/06/98	Amount of Each Receipt this Period \$ 9570.00
Receipt for Federal Election Year	Aggregate YTD	\$ 865957.00	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 09/05/98	Amount of Each Receipt this Period \$ 11520.00
Receipt for Federal Election Year	Aggregate YTD	\$ 878517.00	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 09/11/98	Amount of Each Receipt this Period \$ 14333.00
Receipt for Federal Election Year	Aggregate YTD	\$ 892850.00	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 09/13/98	Amount of Each Receipt this Period \$ 1942.00
Receipt for Federal Election Year	Aggregate YTD	\$ 894792.00	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 09/17/98	Amount of Each Receipt this Period \$ 106.30
Receipt for Federal Election Year	Aggregate YTD	\$ 894878.30	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee Occupation	Date 09/18/98	Amount of Each Receipt this Period \$ 15720.00
Receipt for Federal Election Year	Aggregate YTD	\$ 910598.30	
Full Name, Mailing Address and ZIP Code Darke County Democratic Party 242 Hickory Dr Greenville, OH 45331	Name of Employer Darke County Democratic Party Occupation	Date 09/19/98	Amount of Each Receipt this Period \$ 1000.00
Receipt for Federal Election Year	Aggregate YTD	\$ 1000.00	
Full Name, Mailing Address and ZIP Code Noble County Democratic Party Box 262 Belle Valley, OH 43717	Name of Employer Noble County Democratic Party Occupation	Date 09/19/98	Amount of Each Receipt this Period \$ 386.75
Receipt for Federal Election Year	Aggregate YTD	\$ 386.75	

TOTAL This Period (last page this line number only)

\$ 208424.05

SCHEDULE A

ITEMIZED RECEIPTS

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NAME OF COMMITTEE (In Full)

Ohio Democratic Party Federal Campaign Account

Full Name, Mailing Address and ZIP Code Sandusky County Democratic Party P O Box 97 Farmort, OH 43420	Name of Employer Sandusky County Democratic Party	Date 08/18/98	Amount of Each Receipt this Period \$ 500.00
	Occupation		
Receipt for Federal Election Year	Aggregate YTD	\$ 500.00	
Full Name, Mailing Address and ZIP Code Auglaize County Democratic Party 394 E 4th St Minster, OH 45865	Name of Employer Auglaize County Democratic Party	Date 08/23/98	Amount of Each Receipt this Period \$ 500.00
	Occupation		
Receipt for Federal Election Year	Aggregate YTD	\$ 500.00	
Full Name, Mailing Address and ZIP Code Guernsey Co Democratic Exec Comm 806 S. 7th St. Cambridge, OH 43725	Name of Employer Guernsey Co Democratic Exec Comm	Date 09/23/98	Amount of Each Receipt this Period \$ 979.82
	Occupation		
Receipt for Federal Election Year	Aggregate YTD	\$ 979.82	
Full Name, Mailing Address and ZIP Code Marion County Democratic Party 413 Forest Lawn Blvd Marion, OH 43302	Name of Employer Marion County Democratic Party	Date 09/23/98	Amount of Each Receipt this Period \$ 500.00
	Occupation		
Receipt for Federal Election Year	Aggregate YTD	\$ 500.00	
Full Name, Mailing Address and ZIP Code Putnam County Democratic Party 9853 St. Rt. 65 Ottawa, OH 43875	Name of Employer Putnam County Democratic Party	Date 09/23/98	Amount of Each Receipt this Period \$ 300.00
	Occupation		
Receipt for Federal Election Year	Aggregate YTD	\$ 550.00	
Full Name, Mailing Address and ZIP Code Van Wert County Democratic Party 316 W Main St Van Wert, OH 45891	Name of Employer Van Wert County Democratic Party	Date 09/27/98	Amount of Each Receipt this Period \$ 505.44
	Occupation		
Receipt for Federal Election Year	Aggregate YTD	\$ 505.44	
Full Name, Mailing Address and ZIP Code Wyandot County Democratic Party 618 N Sandusky Ave Upper Sandusky, OH 43351	Name of Employer Wyandot County Democratic Party	Date 09/27/98	Amount of Each Receipt this Period \$ 732.55
	Occupation		
Receipt for Federal Election Year	Aggregate YTD	\$ 732.55	
Full Name, Mailing Address and ZIP Code Democratic National Committee 430 S Capitol St SE Washington, DC 20003	Name of Employer Democratic National Committee	Date 09/30/98	Amount of Each Receipt this Period \$ 372.80
	Occupation		
Receipt for Federal Election Year	Aggregate YTD	\$ 911070.90	

TOTAL This Period (last page this line number only)

\$ 211414.25

